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Attorneys for Plaintiff(s)

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

| | | |
|------------------------------|---|---------------------------------|
| DAVID GUIDRY, an individual; |) | Case No.: 2:21-cv-01238-TLN-JDP |
| |) | |
| Plaintiff, |) | STIPULATION AND ORDER TO EXTEND |
| |) | CASE SCHEDULE |
| v. |) | |
| |) | |
| CITY OF STOCKTON et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

1 IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiff and
2 Defendants by and through their designated counsel, that:

3 WHEREAS, the parties met and conferred.

4 WHEREAS, on July 14, 2021, Plaintiff filed his Complaint. (Doc 1).

5 WHEREAS, on August 18, 2021, Defendants filed their Answer. (Doc 7)

6 WHEREAS, on March 25, 2022, the Court granted Defendants' substitution of attorney,
7 with Mark E. Berry to appear for Daniel Grauman, in place of attorney Jamil Radwan Ghannam
8 (Doc. 20); Mark E. Berry to appear for Sean McPherson in place of attorney Jamil Radwan
9 Ghannam. (Doc. 21); and Mark E. Berry to appear for City of Stockton, in place of attorney Jamil
10 Radwan Ghannam (Doc. 22).

11 WHEREAS, on March 30, 2022, the Court granted Defendants' substitution of attorney,
12 with Mark E. Berry to appear for Zachary Adams in place of attorney Jamil Radwan Ghannam
13 (Doc. 25); and Mark E. Berry to appear for Jeremiah Skaggs in place of attorney Jamil Radwan
14 Ghannam (Doc. 26)

15 WHEREAS, Defendants' counsel will need time to get up to date with the case, and
16 conduct discovery.

17 WHEREAS, Plaintiff will be adding a new attorney to the case.

18 WHEREAS, for all the aforementioned reasons, the parties stipulate and request that the
19 Court extend the case schedule by three (3) months.

20 WHEREAS, the current case schedule is set as:

| | |
|--|--------------------|
| 21 Fact Discovery Cut-Off: | May 27, 2022 |
| 22 Expert Discovery Opening Reports | July 29, 2022 |
| 23 Expert Rebuttal | August 26, 2022 |
| 24 Expert Discovery Cut-Off | September 30, 2022 |
| 25 Last Day to File Dispositive Motion | January 6, 2023 |

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WHEREAS, the parties request the Court amend the case schedule as follows:

| | |
|-------------------------------------|-------------------|
| Fact Discovery Cut-Off: | August 29, 2022 |
| Expert Discovery Opening Reports | October 31, 2022 |
| Expert Rebuttal | November 28, 2022 |
| Expert Discovery Cut-Off | December 30, 2022 |
| Last Day to File Dispositive Motion | April 6, 2023 |

IT IS SO AGREED.

Dated: April 6, 2022


/s/Patrick Buelna
PATRICK M. BUELNA
Attorney for Plaintiff

Dated: April 6, 2022

/s/ Mark Berry
Mark E. Berry
Attorney for Defendants

IT IS SO ORDERED.

Dated: April 6, 2022


Troy L. Nunley
United States District Judge